

CAROLYN A. DYE (SBN 97527)
15030 Ventura Boulevard
Suite 527
Sherman Oaks, CA 91403
Telephone: 818/287-7003
Facsimile: 323/987-5763
Email: trustee@cadye.com

Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re)	Case No. 2:17-bk-10861-WB
)	[Chapter 7]
SOPHONNA NONG,)	
)	TRUSTEE'S NOTICE OF INTENTION
Debtor.)	TO ADMINISTER FUNDS RECEIVED
)	FROM RECEIVERSHIP PROCEEDING
)	
)	[No Hearing Unless Requested;
)	Local Bankruptcy Rule 6007-1]
)	

TO THE HONORABLE JULIA W. BRAND, UNITED STATES BANKRUPTCY JUDGE,
THE UNITED STATES TRUSTEE, DEBTOR, ALL CREDITORS AND OTHER
PARTIES IN INTEREST:

PLEASE TAKE NOTICE that Carolyn A. Dye, Chapter 7 Trustee
("Trustee") for the estate of Sophonna Nong ("Debtor"), proposes
to administer funds distributed on account of a claim filed in
the Receivership proceeding initiated by the Securities and
Exchange Commission proceeding in which Thomas Seaman was
appointed as permanent receiver. Although a claim for \$23,325 was
filed in the Receivership, the distribution to the estate was

1 only \$9,974.25.

2 The factual background for the Receivership is as follows:
3 On December 8, 2016, the United States District Court for the
4 Central District of California, granted the SEC's motion for
5 summary judgment against Steve Chen and his affiliated companies,
6 including USFIA, finding him liable on all of the claims asserted
7 against him. The Court found that Chen: (1) ran USFIA as a
8 fraudulent pyramid scheme; (2) sold investors securities, whether
9 characterized as investment contracts or pyramid scheme
10 transactions, which were not registered with the SEC; (3) those
11 sales were made though interstate commerce; (4) defrauded
12 investors by failing to advise them that the pyramid scheme was
13 destined to collapse; (5) made five material misrepresentations
14 to investors in connection with the sale of the securities; (6)
15 misused investor funds to fund a lifestyle that included multiple
16 million-dollar mansions and luxury automobiles for him and his
17 family; (7) acted with a high degree of scienter; (8)
18 orchestrated the pyramid scheme over many years; and (9) showed
19 no recognition of wrongdoing and no assurance against future
20 violations. The Receivership liquidated various assets and
21 established a fund for payment of claims to those who invested
22 with Chen.

23 Debtor listed this claim in her amended Schedules B and C
24 and claimed an exemption for \$15,000 under Section Cal.C.Civ
25 Pro., Section 703.140(b)11 for that amount.

26 None of the exemptions available under C.C.P. Section
27 703.140(b)11 apply to the funds recovered and, thus, Trustee
28 contends no exemption is available. Having investigated the

1 nature of the Debtor's claim, the proceedings in the Receivership
2 and the creditors' claim in this case, Trustee proposes to
3 administer these funds for the benefit of the creditors of this
4 estate.

5 PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy
6 Rule 6007-1, the Trustee will take the proposed action without
7 further hearing or order of the Court unless a timely objection
8 or request for a hearing is filed by an interested party no later
9 than fourteen (14) days from the date of service of this Notice,
10 plus an additional three (3) days unless the notice of motion was
11 served by personal delivery or posting as described in F.R.Civ.P
12 5(b)(2)(A)-(B). Any objection or request for a hearing must be in
13 writing and must be filed with the United States Bankruptcy
14 Court, 255 East Temple Street, Room 100, Los Angeles, CA 90012,
15 and served upon Trustee at the address in the upper left hand
16 corner of the first page this Notice and upon the Office of the
17 United States Trustee at 915 Wilshire Blvd., Suite 1850, Los
18 Angeles, CA 90017. A hearing will then be set by Trustee.

19 Unless objections are timely filed and served, Trustee will
20 proceed to administer these funds.

21
22
23 Dated: December 29, 2022


Carolyn A. Dye, Chapter 7 Trustee

24
25
26
27 Service Date: December 29, 2022
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 15030 Ventura Boulevard, Suite 527, Sherman Oaks, CA 91403.

A true and correct copy of the foregoing document entitled Notice of Trustee's Intention to Administer Funds Received from Receivership Proceeding will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On December 29, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

William Patrick Andrews	askbk@resurgent.com
Joseph C Delmotte	ecfcacb@aldridgepите.com, JCD@ecf.inforuptcy.com;
	jdelmotte@aldridgepите.com
Carolyn A Dye (TR)	trustee@cadye.com, c197@ecfbis.com; atty@cadye.com
Merdaud Jafarnia	bknotice@mccarthyholthus.com, mjafarnia@ecf.inforuptcy.com
Valerie Smith	claims@recoverycorp.com
United States Trustee (LA)	ustregion16.la.ecf@usdoj.gov
Brad Weil	bfweil@justbradlegal.com, brad@ecf.courtdrive.com;
	frontdeskweillaw@gmail.com
Bethany Wojtanowicz	bethanyw@w-legal.com, BNC@w-legal.com

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:** On December 29, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

■ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY - N/A:** Pursuant to Fed.R.Civ.P. 5 and/or controlling LBR, on _____, 2022, I arranged for service on the following person as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 29, 2022



Karissa De La Trinidad

Label Matrix for local noticing

973-2

Case 2:22-bk-12841-ER

Central District of California

Los Angeles

Thu Dec 29 14:54:31 PST 2022

Los Angeles Division

55 East Temple Street,

Los Angeles, CA 90012-3332

RANCHISE TAX BOARD

BANKRUPTCY SECTION MS A340

PO BOX 2952

SACRAMENTO CA 95812-2952

Mihad Mohamad Khalil

c/o Wassim Abou Nader, Esq.

Office 510 Arab Bank Bldg.

Riad El Solh

Beirut, Downtown Lebanon

Steven A. Friedman Esq (GE Medical Systems)

4900 Key Tower 127 Public Square

Cleveland, OH 44114

David M Browne

David M Browne

1900 Burbank Blvd Ste 112

Woodland Hills, CA 91367-7927

Dumas & Kim, APC

DUMAS & KIM, APC.

915 Wilshire Blvd

Ste. 1775

Los Angeles, CA 90017-3575

Accounts Receivable Acquisitions

Mena City Lawyers

Tilal Bldg Block A7-Ashrafieh Street

PO Box 135113

Beirut, Downtown Lebanon

GE Medical Systems

c/o Philippe Glaser

Avocat Au Barreau De Paris

42 Avenue Montaigne, 75008

Paris, France

Nadim Nimr Yassin

c/o Wassim Abou Nader, Esq.

Office 510 Arab Bank Bldg.

Riad El Solh

Beirut, Downtown Lebanon

United States Trustee (LA)

915 Wilshire Blvd, Suite 1850

Los Angeles, CA 90017-3560

End of Label Matrix

Mailable recipients 15

Bypassed recipients 0

Total 15

Prometheus Health Imaging, Inc.

269 S. Beverly Dr.

Suite 1800

Beverly Hills, CA 90212-3851

Ali Nasih Mohsen

c/o Wassim Abou Nader, Esq.

Office 510 Arab Bank Bldg.

Riad El Solh

Beirut, Downtown Lebanon

GE Medical Systems Europe

Steven A. Friedman, Esq.

Squire Patton Boggs

4900 Key Tower 127 Public Square

Cleveland, OH 44114

Phillippe Glasser (GE Medical Systems)

42 Avenue Montaigne 75008

Paris, France

Carolyn A Dye (TR)

Law Offices of Carolyn Dye

15030 Ventura Blvd., Suite 527

Sherman Oaks, CA 91403-5470